

Exhibit

11

Missouri

Exhibit 11A

Meta's Proposal[s]

MDL 3047 – 2024-12-20 Agency Discovery JLB
Missouri – Meta Proposal

Status: Missouri has agreed in principle to dismiss its case, subject to the parties memorializing their agreement in writing.

This Court issued orders directing Missouri to propose agency search terms and custodians to Meta by November 1, 2024, and to disclose individual agency litigation hold recipient information to Meta on a weekly basis (ECF Nos. 1291, 1299). To date, Missouri has not provided Meta with any proposed search terms or custodians, or any list of individual litigation hold recipients.

Search Terms: Meta made its most recent proposal on November 22, 2024, to the Missouri (i) Department of Economic Development, (ii) Department of Elementary and Secondary Education, (iii) Department of Health and Senior Services, (iv) Department of Higher Education & Workforce Development, (v) Department of Mental Health, (vi) Department of Social Services, (vii) Office of Administration, (viii) Office of the Child Advocate, and (ix) Governor’s Office. Meta’s proposal requested that (i) agencies focused on youth issues run search strings 1-15 as-is, without any combinations or connectors, and (ii) agencies not focused exclusively on youth issues run search strings 1-15 combined with one of the following “Youth” terms using an “AND” connector:

(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen- a* OR scholar* OR School* OR student* OR pupil* OR grade*)

<i>Search Set 1 – Youth Use of Social Media</i>	
1.	(“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”)
<i>Search Set 2 – Youth Mental Health / Wellbeing Issues</i>	
2.	(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
3.	(“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)

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4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)
5.	(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
6.	(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9.	(negative w/3 (appearance OR experience OR affect* OR effect*))
10.	(compar* w/5 (appearance OR social OR other* OR negative))
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13.	(Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
14.	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)
<i>Search Set 3 – Other Case Issues</i>	
15.	(polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem*

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	OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)
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Custodians: The Missouri Attorney General’s Office has not proposed custodians for any of the target agencies, nor has it produced information that is sufficient to allow Meta to identify a representative set of custodians that covers the relevant time period and subject matter for each agency. In the event the parties do not finalize their agreement and Missouri dismisses its case, Meta requests that the Court require the Missouri agencies to identify custodians that meet that criteria within three days of the Court’s order resolving this dispute. Meta reserves the right to request additional custodians in a meet and confer to be scheduled promptly after the agencies’ disclosure of an initial proposed custodian set.

Meta proposes that, in the event the parties do not finalize their agreement and Missouri dismisses its case, the search terms set forth above should be run against custodians for the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).